

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT Knoxville, Tn

Shelley A Keith

3:09-cv-284

(Enter above the NAME of  
the plaintiff in this action.)

v.

Campbell County / City of Lafayette  
Jeremy Cross

(Enter above the NAME of  
each defendant in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES( ) NO(✓)
- B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs \_\_\_\_\_

Defendants \_\_\_\_\_

2. COURT (If federal court, name the district; if state court, name the county):

3. DOCKET NUMBER: \_\_\_\_\_

4. Name of Judge to whom case was assigned:

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT: Knox County Jail

A. Is there a prisoner grievance procedure in this institution? YES (✓) NO ( ) N/A

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? YES ( ) NO (✓) N/A

C. If your answer is YES,

1. What steps did you take? N/A

2. What was the result? \_\_\_\_\_

D. If your answer to B is NO, explain why not. \_\_\_\_\_

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?  
YES ( ) NO ( )

F. If your answer is YES,

1. What steps did you take? \_\_\_\_\_

2. What was the result? \_\_\_\_\_

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III. PARTIES

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: Shelley A. Keith

Present address: 310 Illinois Rd Knoxville, TN 37914

Permanent home address: Same

Address of nearest relative: 118 Summers Rd,  
LaFollette, TN 37766

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

City of LaFollette  
B. Defendant: Campbell County and Jeremy Cross

Official position: \_\_\_\_\_

Place of employment: Campbell County Police Dept.

C. Additional Defendants: \_\_\_\_\_

IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case.)

Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

On July 5, 2008 a cop pulled me over on a street in Campbell County I am unsure of the street because

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STATEMENT OF CLAIM (Continued)

I live in Knoxville. The officer gave me a warning and let me go w/out incident. While we were pulled over, another officer came onto the scene, he yelled for me to come over to his car, I did, he started to flirt w/ me. He asked me to go for a ride w/ him, I said "I really can't because my son is asleep at a friend's house and I have to get back." He says "Come on, just a little ride not a long one, we let you go without taking you to jail, I could still take you, you know?" I was driving without a license so I felt obligated to go. I got into the front seat of the car moving a shotgun out of my way. He told me to hide so I did, hunched down low in the seat. He drove for about 2 minutes then stopped turning off his camera in the car. He then asked



to see my Breast. I said 'no'. he then pulled out his private and told me to give it a kiss, really demanding me to do it and when I did he held my head down there until he ejaculated in my mouth when he was done he zipped his pants and drove me back close to where my friend's pickup truck was parked, I got out and haven't seen him since!

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V. RELIEF

(State BRIEFLY exactly what you want the Court to do for you. Make No legal arguments. Cite No cases or statutes.)

I feel I should be compensated for my emotional distress seeing as I now take anxiety medication and must see a counselor for my trust issues for authority figures. The loss of time and emotion from my family is incomparable to me!!

SIGNED THIS 21 DAY OF June, 192009

Shelley A. Keith  
SIGNATURE OF PLAINTIFF

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

June 27, 2009  
DATE

Shelley A. Keith  
SIGNATURE OF PLAINTIFF

YOU ARE RESPONSIBLE FOR KEEPING THE COURT INFORMED IMMEDIATELY OF ANY ADDRESS CHANGES. FAILURE TO PROVIDE YOUR CORRECT ADDRESS TO THIS COURT WITHIN TEN (10) DAYS FOLLOWING ANY CHANGE OF ADDRESS WILL RESULT IN THE DISMISSAL OF THIS ACTION.